

# Fact Sheet



## For Final Significant Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Significant Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on January 10, 2012.

Permit Number: **R30-10900019-2012**

Application Received: **June 6, 2012**

Plant Identification Number: **03-54-109-00019**

Permittee: **Dominion Transmission, Inc.**

Facility Name: **Loup Creek Station**

Mailing Address: **445 West Main Street, Clarksburg, WV 26301**

Permit Action Number: SM01      Revised: December 18, 2012

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Physical Location:	Kopperston, Wyoming County, West Virginia
UTM Coordinates:	449.31 km Easting • 4176.86 km Northing • Zone 17
Directions:	From I-77 at Harper Road, turn onto State Route 3 north for 10.4 miles. Turn onto Route 99 west for 14.3 miles. Turn left on Route 85 and travel 4 miles to Kopperston Grade School. Turn left on private road to Loup Creek Station.

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### Facility Description

Loup Creek Compressor Station is a natural gas transmission facility covered by Standard Industrial Classification (SIC) Code 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of four (4) natural gas fired reciprocating compressor engines, one reciprocating emergency generator, one (1) dehydrator reboiler, one (1) dehydration unit with flare, and storage tanks of various sizes.

Under this modification the permittee has installed an oxidation catalyst on the engine EN04 having emission unit ID 001-04. The engine is a 4SLB, greater than 500 Hp RICE operated at an area source of HAPs. The installation of this catalyst was necessary in order to meet the CO reduction requirements of 40 CFR 63, subpart ZZZZ by the October 19, 2013 compliance date.

## Modification Emission Summary

Criteria Pollutants	Potential Emissions (tpy)
Carbon Monoxide (CO)	-17.81

## Title V Program Applicability Basis

This facility has the potential to emit 406 tons of NO<sub>x</sub> per year and 102 tons per year of VOC. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, Dominion Transmission, Inc is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR13	New Source Construction
45CSR30	Operating permit requirement.
40 C.F.R. 63, Subpart ZZZZ	Area Source RICE Standards

State Only:

None

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2839B	09-17-2012	R13-2324B was superseded and replaced

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B" which may be downloaded from DAQ's website.

## Determinations and Justifications

The following describes changes to the Title V permit related to this proposed significant modification.

### Changes to Section 1.0 Equipment Table and listing of Active R13, R14, and R19 Permits:

Within the equipment table, control device ID 2C was added to the control device column of the table for emission unit ID 001-04. In section 1.2 the R13 permit R13-2839A was updated to B, which was issued on September 17, 2012. R13 permit R13-2324B was removed from the table due to being superseded by the newly amended R13-2839B permit.

### Changes to Section 9.0 requirements related to engine 001-04, emission point EN04:

- Condition 9.1.5 was modified by reducing the CO emission limits as reflected by R13-2839B, condition 10.1.1. This also included adding footnotes to the table in accordance with the Rule 13 permit.
- A new condition 9.1.6 was added to reflect condition 10.1.2 of R13-2839B.
- Within all conditions of section 9.2 the citation was modified by adding a reference to the R13-2839B monitoring condition which incorporated 40 CFR 63, subpart ZZZZ by reference.
- Likewise, with the exception of 9.3.5, all citations within 9.3, 9.4, and 9.5 were updated to recognize the Rule 13's incorporation by reference of conditions for testing, recordkeeping, and reporting requirements under subpart ZZZZ. This was appropriate since all conditions, except 9.3.5, came from subpart ZZZZ.
- Condition 9.3.5 was revised to reflect a citation change from the superseded permit R13-2324 to R13-2839. In addition the language was revised to incorporate a change from Director to Secretary as specified in the newly amended R13-2839B permit.
- Original permit condition 9.3.6 was removed due to it originating from the older superseded permit R13-2324B. The new minor source NSR permit, R13-2839B did not preserve this condition.
- Within condition 9.1.2 the second half of table 2b was removed. Since the company opted to use the oxidation catalyst control method, the alternative method was removed.

## Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

The 40CFR64 CAM applicability requirements within §64.2(a) were evaluated and found not to be applicable to the engine due to its potential pre-control device emissions being less than major source thresholds for any regulated pollutant on a yearly basis.

These emissions are listed within the modification application as such:

Pollutant	Maximum Potential Uncontrolled		Maximum Potential Controlled	
	Lb/hr	Tons/yr	Lb/hr	Tons/yr
NO <sub>x</sub>	3.80	16.60	3.80	16.60
CO	<b>4.56</b>	<b>20.00</b>	<b>0.50</b>	<b>2.19</b>
PM	0.08	0.35	0.08	0.35
SO <sub>2</sub>	<0.01	0.02	<0.01	0.02
VOC	1.27	5.60	1.27	5.60
Acetaldehyde	0.07	0.29	0.07	0.29
Acrolein	0.04	0.18	0.04	0.18
Benzene	<0.01	0.02	<0.01	0.02
Ethylbenzene	<0.01	<0.01	<0.01	<0.01
Formaldehyde	0.42	1.86	0.42	1.86
Toluene	<0.01	0.01	<0.01	0.01
Xylene	<0.01	0.01	<0.01	0.01

### **Request for Variances or Alternatives**

None

### **Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: October 31, 2012

Ending Date: November 30, 2012

All written comments should be addressed to the following individual and office:

Jesse Hanshaw, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Jesse Hanshaw, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1216 • Fax: 304/926-0478

### **Response to Comments**

No comments received